

SHER TREMONTÉ LLP

December 18, 2018

**BY ECF**

The Honorable Pamela K. Chen  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re:** *United States v. Brayan Jiménez*, 15 Crim. 252 (PKC)

Dear Judge Chen:

We write on behalf of our client, Brayan Jiménez, to respectfully request a temporary modification of Mr. Jiménez's travel restrictions that would permit him to stay out past his curfew on the following dates:

- until 2 a.m. on December 31, 2018 (*i.e.*, allowing Mr. Jimenez to stay out on the night of December 31, 2018 and return home at 2 a.m. on January 1, 2019);
- until midnight on January 1, 2019; and
- until midnight on January 2, 2019.

Mr. Jimenez's family is visiting him from Guatemala from December 29, 2018 to January 8, 2019 to celebrate the New Year and his daughter's birthday. Pre-Trial Services and the government consent to our request.

We appreciate the Court's consideration.

Respectfully submitted,

/s/  
\_\_\_\_\_  
Justine A. Harris  
Heather Y. Han

*Attorneys for Brayan Jiménez*

cc: All counsel of record (by ECF)  
United States Pre-Trial Services Officer Anna Lee (by email)